

EXHIBIT E

EXHIBIT 17

EXHIBIT FILED UNDER SEAL

Sunny Wong Highly Confidential
June 25, 2025

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.)
PASSENGER SEXUAL ASSAULT)
LITIGATION)

_____)
_____)
This Document Relates to:) No. 3:23-md-03084-CRB
All Cases)
_____)

*** HIGHLY CONFIDENTIAL ***

VIDEOTAPED DEPOSITION OF SUNNY WONG

AS 30(b)(6) WITNESS OF UBER

June 25, 2025

9:13 a.m.

555 California Street, Suite 2700
San Francisco, California 94104

Reported by:

Natalie Y. Botelho

CSR No. 9897

June 25, 2025

1 A. Its goal is, again, to reduce the rate of
2 sexual assault reports on the Uber platform,
3 correct.

4 Q. Well, this doesn't say "to reduce the rate
5 of sexual assault reports on the Uber platform."
6 This says, "reduce sexual assaults on the Uber
7 platform." And my question for you is, is it still
8 Uber's goal to reduce sexual assaults on the Uber
9 platform using S-RAD?

10 A. It is.

11 Q. And the way that S-RAD does that is by
12 identifying and preventing driver-rider matches with
13 elevated risk, right?

14 A. Correct.

15 Q. That's what S-RAD aims to do, in a
16 nutshell, right?

17 A. That's what it aims to do.

18 Q. Other than S-RAD, is there anything
19 else -- are there any other safety programs that
20 Uber uses to try to reduce the risk of sexual
21 assault with respect to its dispatch or driver-rider
22 matches?

23 A. I'm not aware of any.

24 Q. S-RAD is a data-driven -- it's -- well,
25 first, S-RAD is intended to be a data-driven

1 **Uber uses a machine learning model?**

2 A. It is.

3 **Q. And Uber uses that machine learning model**
4 **to help identify -- I'm going to call them**
5 **rider-driver pairings -- that would reduce the**
6 **probability of sexual assault; is that true?**

7 A. The model helps scores those particular
8 plans for given trip requests, and then the second
9 stage of S-RAD is the looking at potentially
10 downranking and reducing the probability of specific
11 plans.

12 **Q. Okay. In order to score each rider-driver**
13 **pairing, does S-RAD look at risk signals or**
14 **predictors?**

15 A. The model leverages, you know, numerous
16 features or inputs to come up with a score for a
17 particular driver-rider supply plan.

18 **Q. Are those inputs or features also known as**
19 **risk signals or predictors?**

20 A. We refer to them as features.

21 **Q. Okay. Let's go to -- back to 1240.**

22 MR. PREMO-HOPKINS: And just for the
23 record and for later, because you've got a different
24 number on here, would you mind putting the Bates
25 number on when we start with a document?

1 THE WITNESS: Again, Sunny Jeon's called
2 it "predictors." We particularly called it more
3 "features." It's information that's fed into the
4 model to help, again, improve or produce a score for
5 a driver-rider supply plan.

6 BY MS. PETERS:

7 Q. Is it your understanding that the
8 predictors what Sunny Jeon was calling predictors
9 are helpful for trying to predict risk?

10 MR. PREMO-HOPKINS: Object to form.

11 THE WITNESS: Looking at the document, it
12 seems like he has identified potential variables or
13 factors to help feed into the S-RAD model.

14 BY MS. PETERS:

15 Q. So that's not my question. I'm asking
16 you, as the person who was designated to speak on
17 behalf of Uber about its risk-sensitive matching of
18 riders and drivers, as well as risk factors, are the
19 predictors that the S-RAD model was leveraging
20 factors that are supposed to help it predict
21 something?

22 A. That's the goal of having the features
23 into the model, to help produce a model score.

24 Q. Does that remain true today, that the
25 inputs or features that the model uses are intended

1 to try to help predict something?

2 MR. PREMO-HOPKINS: Object to form.

3 THE WITNESS: Yes.

4 BY MS. PETERS:

5 Q. Uber also refers to the predictors as risk
6 signals, right?

7 A. We typically refer to them as, again,
8 features into the model.

9 Q. But if you could go back, please, to
10 Exhibit 1239, Page 9. So -- sorry. Strike that.

11 So just for the record, Exhibit 1239 is
12 Bates number ending in 2266899. And Mr. Wong, if
13 you would please turn to Page 9, which is the one
14 ending in .9. Are you there?

15 A. I am.

16 Q. The title of this slide is "Prevention
17 Strategy: Risk Signals." Do you see that?

18 A. I do see it.

19 Q. The first bullet point says, "Sexual
20 assaults are rare and appear unpredictable, but many
21 have risk signals." Do you see that?

22 A. I do see that.

23 Q. Is that referring to the same thing as the
24 other document was calling predictors?

25 A. I can't say for sure if they're referring

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1 **see that?**

2 A. I do see that.

3 **Q. The question is, "Can these risk signals**
4 **be leveraged to better anticipate and prevent sexual**
5 **assaults?" Do you see where I'm reading from?**

6 A. I am able to see that. Yes, I see that
7 Sunny Jeon's posed that question.

8 **Q. And the answer to that question turned out**
9 **to be "yes," right?**

10 A. Well, this was early work in S-RAD. And
11 again, this team worked on the development of S-RAD,
12 and it seems like early work in understanding what
13 are possible signals.

14 **Q. The answer to that question turned out to**
15 **be "yes," right?**

16 MR. PREMO-HOPKINS: Object to form.

17 THE WITNESS: Well, led into the
18 development of S-RAD.

19 BY MS. PETERS:

20 **Q. Right. And once S-RAD was developed, the**
21 **answer to the question here turned out to be "yes,"**
22 **right?**

23 MR. PREMO-HOPKINS: Same objection.

24 THE WITNESS: Correct.

25

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1 BY MS. PETERS:

2 Q. Right. So I think you're getting into the
3 explanation. I'm just asking, you are aware that

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 Q. And when you say "plans," you're talking
11 about particular pairings of particular drivers with
12 particular riders, right?

13 A. Correct.

14 Q. [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 MR. PREMO-HOPKINS: Object to form.

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 BY MS. PETERS:

23 Q. [REDACTED]

24 A. [REDACTED]

25 Q. [REDACTED]

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1

2

A.

3

4

5

6

Q.

Right.

7

8

9

10

A.

Correct.

11

Q.

And if we go to the page ending in 708 --

12

no. Just kidding. Wrong one. 711, please.

13

14

15

16

A.

I see someone has put that on Slide -- I

17

see that someone has put that on the slides there.

18

I don't know who wrote that.

19

Q.

This -- whoever put this comment in the

20

notes on this slide says,

21

22

23

24

25

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1

2

3

4 A. I do see where you're reading from.

5 Q.

6

7

8 MR. PREMO-HOPKINS: Object to form.

9 THE WITNESS: I have not been involved

10 with what information to disclose to the public

11 about S-RAD.

12 BY MS. PETERS:

13 Q.

14

15

16 MR. PREMO-HOPKINS: Object to form.

17 THE WITNESS: I don't have that concern,

18 but again, to clarify, the sexual -- report of

19 sexual assaults and sexual misconduct on the

20 platform are extremely rare. We're talking about

21 one in over a million trips. We don't have -- we're

22 not able to identify with reasonable confidence that

23 something potentially might happen on a trip.

24

25 MS. PETERS: And object to everything

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1 **sexual assaults?**

2 A. I didn't. I didn't have time to look at
3 that during lunch.

4 **Q. Okay. Okay.**

5 A. Maybe they were able to pull it. If we
6 need to take another break later on, we can be -- we
7 can focus on that, yeah.

8 **Q. Sounds good.**

9 A. Yeah.

10 **Q. Sounds good. Okay.**

11 All right. I want to talk about the words
12 "safety risk assessed dispatch" or "S-RAD" a little
13 bit more. So the last word in that title for the
14 program is the word "dispatch," right?

15 A. Correct.

16 **Q. And that's something that Uber does, is it**
17 **when it receives a ride request, it pairs a**
18 **particular driver to that ride request, and it**
19 **dispatches that driver, right?**

20 A. That's correct.

21 MS. PETERS: Can we go to Document 68,
22 please. This has been previously marked as
23 Exhibit 546 to the Silver deposition. For the
24 record, this is a document starting with Bates
25 No. UBER_JCCP_MDL_541461. And for the record, it's

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1 vehicles. And it says, "Every time a rider requests
2 a ride, there are multiple potential drivers that
3 they can be matched with." Right?

4 A. I'm able to see that, yes, it refers to
5 the driver-rider supply plans we talked about
6 earlier, yep.

7 Q. Right. So what you've been referring to,
8 "driver-rider supply plans," you're talking about
9 the same thing that this slide is talking about,
10 that there are multiple potential matches with
11 potential drivers, right?

12 A. That's correct.

13 Q. And next page. Uber looks for the right
14 or best match for a ride request, right?

15 MR. PREMO-HOPKINS: Object to form.

16 THE WITNESS: Yeah, as -- are you
17 referring to what's on the doc, or are you just
18 asking?

19 BY MS. PETERS:

20 Q. I'm just asking for now. So when -- Uber
21 looks for the best driver pairing for a given ride
22 request, right?

23 A. And it's looking for the available drivers
24 that meet the criteria, and then it will find the
25 driver that they feel like it's the best match for

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1 that request.

2 Q. Right?

3 A. Right.

4 Q. And when searching for the right match for
5 a given rider, Uber looks at, among other things,
6 safety, right?

7 A. Well, S-RAD -- you know, we talked about
8 earlier that it scores driver-rider pairings and
9 then tries to reduce the probability of those
10 pairings from being dispatched at the end of the
11 request.

12 Q. Yeah, but I'm not getting into the weeds
13 of S-RAD yet. I'm just saying, one of the things
14 that Uber is looking at at the -- when it's making
15 the pairing decisions is safety, right?

16 A. It's considering S-RAD.

17 Q. My question is, is Uber, when it makes
18 pairing decisions, taking safety into account?

19 A. As far as leveraging S-RAD as that safety
20 component, correct, yes.

21 Q. So don't even look at the document.

22 A. Okay.

23 Q. Just asking -- I'm just asking the simple
24 question. When Uber makes a pairing decision, does
25 it take safety into account?

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1 using that data. So the goal is to reduce the
2 probability of reports of sexual assaults reported
3 on the platform.

4 BY MS. PETERS:

5 Q. I still don't think you're answering the
6 question. Let me see if I can try to incorporate
7 your language. So my question is, is it true that
8 S-RAD scores potential pairings based on the risk of
9 sexual assault or sexual misconduct for each
10 pairing?

11 A. Yes.

12 Q. And it assigns each pairing [REDACTED]
13 [REDACTED] to reflect that risk, right?

14 MR. PREMO-HOPKINS: Object to form.

15 THE WITNESS: That's the range of the
16 scores that come out of S-RAD.

17 BY MS. PETERS:

18 Q. Is that a "yes"?

19 A. Correct.

20 Q. [REDACTED]
21 [REDACTED]

22 A. Correct.

23 Q. And then within that, when Uber has a trip
24 trigger rate of [REDACTED] that means it's potentially,
25 in the aggregate, actioning the -- within that score

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1 A. How do you mean -- define "rare"?

2 **Q. Does it know the frequency?**

3 A. Again, we -- I'm not aware of anything
4 that's been done previously. And my team hasn't
5 worked on specifically analyzing, say, the control
6 side of the [REDACTED] Again, theoretically, it could,
7 but again, I mentioned earlier I'd probably have a
8 lot of concerns with whether or not we have enough
9 data to the draw any conclusions from doing such
10 analysis.

11 **Q. To your knowledge, that analysis has not**
12 **been done; true?**

13 A. I'm not aware of it. It's possible that
14 someone has conducted it. I'm not aware of any.

15 **Q. When you've referred to "rare," because**
16 **you've brought that up, what did you mean by "rare"?**

17 A. Well, when I think about the report rates
18 of sexual assaults on the platform, again, one in
19 over a million trips, again, that's just my view.
20 That seems like a very rare event. But again, that
21 doesn't deter us from continuing to invest in safety
22 and trying to make those rare events even rarer.

23 **Q. And what -- when Uber's deciding where to**
24 **set the trip trigger rate, what risk level is**
25 **acceptable to Uber?**

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1 MR. PREMO-HOPKINS: Object to form.

2 THE WITNESS: We don't think about it in
3 that context, right. So we establish -- you know,
4 through the development life cycle of S-RAD, they
5 came up with a target [REDACTED] or trigger rate of
6 [REDACTED] and sometimes it's higher, sometimes lower.
7 We talked about how there's a pretty big difference
8 between day and night trigger rates. But again, we
9 continue to reevaluate whether there are
10 opportunities to update the trigger rate as well.

11 BY MS. PETERS:

12 Q. Right, but in terms of actual rates of
13 sexual assault, what -- what rate of sexual assault
14 is acceptable to Uber?

15 MR. PREMO-HOPKINS: Object to form.

16 THE WITNESS: There's nothing like that
17 that's been established, right.

18 BY MS. PETERS:

19 Q. If the risk for the -- for sexual assault
20 for a given plan or pairing of particular rider with
21 a particular driver is ten times average, is that
22 acceptable to Uber?

23 MR. PREMO-HOPKINS: Object to form, beyond
24 the scope of the notice.

25 THE WITNESS: Again, we haven't discussed

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1 Q. Okay. And so in deciding where to put the
2 trigger rate, did Uber make a decision about what
3 level of risk for sexual assault was acceptable to
4 Uber?

5 A. Not that I know -- sorry.

6 MR. PREMO-HOPKINS: Object to form.

7 THE WITNESS: Yeah, not that I know of.

8 BY MS. PETERS:

9 Q. And do you know whether for the [REDACTED]
10 of trips, whether the risk is, you know, five times
11 the average, ten times average, 100 times average,
12 1,000 times average? Do you have any idea?

13 MR. PREMO-HOPKINS: Or the same. Could be
14 the same, right?

15 THE WITNESS: I don't know.

16 MS. PETERS: Please, no coaching.

17 THE WITNESS: I do not know. I don't have
18 that data in front of me.

19 BY MS. PETERS:

20 Q. I want to talk about Uber's knowledge. So
21 one of the topics you've been designated on is
22 Uber's knowledge from 2012 to the present that
23 certain risk factors are associated with an elevated
24 risk or rate of sexual assault and/or sexual
25 misconduct. We talked about these at a really high

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1 speak on behalf of Uber about the Uber's knowledge
2 that risk factors are associated with an elevated
3 rate or risk of sexual assault and/or sexual
4 misconduct, do you agree that late-night rides are
5 associated with an elevated rate or risk of sexual
6 assault and/or sexual misconduct?

7 A. From analysis that Sunny and others have
8 done from a -- again, they've conducted correlation
9 analysis that show higher rates. Again, we're not
10 talking about causality or anything like that, but
11 these are early analysis that they've been able to
12 draw some findings of different factors.

13 Q. And so is that a "yes," that as the person
14 designated to speak on Uber's behalf about its
15 knowledge that certain risk factors are associated
16 with an elevated rate or risk of sexual assault
17 and/or sexual misconduct, late-night trips are, yes,
18 associated with an elevated risk?

19 A. They've -- their findings is that there's
20 higher rate of reports of sexual assaults when they
21 looked at daytime versus nighttime.

22 Q. Higher for nighttime, right?

23 A. Correct, yeah. But whether it's 5X or
24 whatever level, I -- you know, it depends on the
25 circumstances, the time period and other factors.

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1 MS. PETERS: Could we put that slide back
2 up, please, Dianne? Sorry about that.

3 BY MS. PETERS:

4 Q. All right. So this is that same Sunny
5 Jeon PowerPoint, and he says, "High-risk trips
6 originate from a bar area." Do you know what he
7 meant by that, "from a" -- by "a bar area"?

8 A. Can you give me a second? Let me see if
9 it's referenced in there somewhere.

10 (Pause.)

11 THE WITNESS: Yeah, it's not in the deck.
12 It might have been in the other write-up that we --
13 that he produced before. I do see that on the
14 slide, though.

15 BY MS. PETERS:

16 Q. So at least in 2018 -- we don't know
17 exactly what a bar area is, but at that point, based
18 on whatever study Uber had done, it was aware that
19 high-risk trips tend to originate from a bar area,
20 right?

21 A. Yeah, without pulling the details of his
22 analysis, that seems to be what Sunny Jeon found to
23 be one of the insights.

24 Q. Right. And he worked for Uber at the
25 time, right?

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1 MR. PREMO-HOPKINS: Just let's go off the
2 record for one second.

3 THE VIDEOGRAPHER: Going off the record at
4 2:49 p.m.

5 (Discussion off the record from 2:49 p.m.
6 to 2:50 p.m.)

7 THE VIDEOGRAPHER: Now we're back on the
8 record at 2:50 p.m.

9 BY MS. PETERS:

10 Q. Do you agree that Uber should do whatever
11 it can to not make driver trip pairings that carry
12 an increased risk of sexual assault?

13 A. Yes.

14 Q. Let's go back to risk factors and
15 knowledge, which was what we were talking about
16 earlier. Uber knows that reports of sexual assault
17 occur more commonly for trips on holidays, right?

18 MR. PREMO-HOPKINS: Object to form.

19 THE WITNESS: Is there a specific document
20 you're referring to?

21 BY MS. PETERS:

22 Q. Actually, strike that. I forgot I wanted
23 to ask you a follow-up question on the surge --
24 surge point that we were on. Do you still have that
25 page open, the 2.5 times more likely report of

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1 Q. You said you see that in the document?

2 A. Yes.

3 Q. Do you have any updated data on that?

4 A. Not that I'm aware of.

5 Q. And then going to Exhibit 1240. That's
6 the Sunny Jeon July 2018 S-RAD Model Overview,
7 page 10. Do you see this Table 2 titled "Predictors
8 of Sexual Assaults"?

9 A. Yep, I see [REDACTED]

10 [REDACTED]

11 Q. Right. We've talked about a number of
12 these, but I wanted to look at something under the
13 [REDACTED] Third
14 row from the bottom is [REDACTED] Do you see
15 that?

16 A. I do see that.

17 Q. And it says, [REDACTED]

18 [REDACTED] Do you see
19 where I'm reading from?

20 A. I'm able to see that.

21 Q. [REDACTED]

22 A. [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 Q. [REDACTED]

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1

2

A.

3

4

5

Q.

6

7

8

A.

Could you give me a moment to read the doc

9

real quick?

10

Q.

Sure.

11

A.

I want to see what references they have on

12

the

13

(Pause.)

14

THE WITNESS: I had a chance to go through

15

it.

16

17

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19

20

BY MS. PETERS:

21

Q.

22

23

24

A.

25

Q.

Is that something that's in the S-RAD